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PROPOSED ATTORNEYS FOR DEBTORS

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

In re:	§	Chapter 11
	§	
ERG Intermediate Holdings, LLC, <i>et al.</i> , <sup>1</sup>	§	Jointly Administered
	§	
Debtors.	§	Case No.: 15-31858-hdh-11

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**NOTICE OF HEARING**

**PLEASE TAKE NOTICE** that by June 3, 2015 the above-captioned debtors (the "Debtors") had filed, among other items, the following motions or applications in connection with these chapter 11 cases:

- a) Application of the Debtors for an Order Authorizing the Employment and Retention of DLA Piper LLP (US) as Special Counsel to the Debtors *Nunc Pro Tunc* to the Petition Date (the "DLA Retention Application") [Docket No. 129];
- b) Motion of the Debtors for an Order Authorizing Them to Pay Prepetition Claims of Certain Essential Suppliers (the "Essential Suppliers Motion") [Docket No. 195]; and
- c) Motion of the Debtors for an Order (A) Approving Payment of Key Employee Incentives, (B) Approving Severance Program and (C) Granting Certain Related Relief (the "Employee Incentive and Severance Motion") [Docket No. 196].

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<sup>1</sup> The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are ERG Intermediate Holdings, LLC (2521); ERG Resources, L.L.C. (0408); West Cat Canyon, L.L.C. (7377); ERG Interests, LLC (2081); and ERG Operating Company, LLC (8385). ERG Intermediate Holdings, LLC is the direct or indirect parent of each of its affiliated Debtors. The mailing address for each of the Debtors, with the exception of ERG Operating Company, LLC, is 333 Clay Street Suite 4400, Houston, TX 77002. The mailing address for ERG Operating Company, LLC is 4900 California Avenue Suite 300B, Bakersfield, CA 93309. The above addresses are listed solely for the purposes of notices and communications.

**PLEASE TAKE FURTHER NOTICE**, that a hearing to consider (a) the DLA Retention Application; (b) the Essential Suppliers Motion; and (c) the Employee Incentive and Severance Motion will be held before the Honorable Judge Harlin D. Hale, United States Bankruptcy Judge, at the United States Bankruptcy Court, 1100 Commerce Street, 14th Floor, Courtroom #3, Dallas, TX 75242-1496 on **June 24, 2015 at 9:00 a.m. (CDT)**, or at such other time as the court may determine.

**PLEASE TAKE FURTHER NOTICE** that any objections or other responses (collectively, "Objections") must be filed on or before **June 17, 2015** (the "Objection Deadline") with the Clerk of the Bankruptcy Court for the Northern District of Texas (the "Clerk's Office"), Earle Cabell Federal Building, 1100 Commerce St., Rm. 1254, Dallas, TX 75242-1496. At the same time, you must serve a copy of the Objection upon the most current Service List filed with the Court pursuant to the Order Granting Complex Chapter 11 Bankruptcy Case Treatment [Docket No. 61]. Objections must be so served so as to actually be received by the parties on the Service List by the Objection Deadline.

Dated: June 3, 2015  
Dallas, Texas

Respectfully submitted,

/s/ Tom A. Howley

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